

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND FEDERAL EXPRESS

September 27, 2016

The Honorable Sarah Netburn
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)


Dear Judge Netburn:

The Plaintiffs' Executive Committees, on behalf of all plaintiffs, and defendants Muslim World League ("MWL") and International Islamic Relief Organization ("IIRO"), write to jointly request an extension of the existing deadline for submission of plaintiffs' motions to compel as to the MWL and IIRO, which is currently set for September 30, 2016. Counsel for the MWL and IIRO recently informed plaintiffs that the defendants will promptly begin making supplemental document productions to address a number of issues and concerns raised by plaintiffs during the meet-and-confer process. The MWL and IIRO expect their supplemental productions will be substantially complete on or before January 31, 2017.

Given the anticipated volume of the productions and the need to translate most documents from Arabic into English, plaintiffs submit the continuing process of analyzing the defendants' documents in advance of plaintiffs' motions will take considerable time. Plaintiffs have conferred with counsel for the MWL and IIRO and the parties respectfully request an extension of the deadline to file any motions to compel as to defendants MWL and IIRO to March 31, 2017.

The parties thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,


 J. Scott Tarbutton, Esq.
 THE MDL 1570 PLAINTIFFS' EXECUTIVE
 COMMITTEES

cc: MDL Counsel of Record (via ECF)